

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BERNADETTE HIGHTOWER, on behalf of
herself and all other similarly situated,

Plaintiff,

v.

RECEIVABLES PERFORMANCE
MANAGEMENT, LLC,

Defendant.

Case No.: 2:22-cv-01683-RSM

**SUPPLEMENTAL DECLARATION OF
PATRICK M. PASSARELLA OF KROLL
SETTLEMENT ADMINISTRATION LLC
IN CONNECTION WITH FINAL
APPROVAL OF SETTLEMENT**

I, Patrick M. Passarella, declare as follows:

INTRODUCTION

1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Settlement Administrator appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision.

2. This declaration supplements the *Declaration of Patrick M. Passarella of Kroll Settlement Administration LLC in Connection with Final Approval of Settlement*, filed on October 18, 2024 (the “Initial Declaration”), in order to provide updated information to the Court regarding Notice Program Reach, Claim Activity, and the number of Requests for Exclusion and objections received by Kroll. The Initial Declaration is incorporated herein by reference in its entirety.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement and Release entered into in this Action.

NOTICE PROGRAM REACH

3. On July 16, 2024, Kroll established a toll-free telephone number, (833) 522-1750, for Class Members to call and obtain additional information regarding the Settlement through an Interactive Voice Response (“IVR”) system. As of November 26, 2024, the IVR system has received 9,225 calls, and 151 callers have been connected to live operators.

4. As of November 26, 2024, 6,953 Short Form Notices were returned by the USPS with a forwarding address. 6,843 Short Form Notices were automatically re-mailed to the updated addresses provided by the USPS. The remaining 110 Short Form Notices were re-mailed to the updated addresses provided by the USPS. In addition to the foregoing, nine (9) additional Short Form Notices were returned a second time and re-mailed by Kroll to a second updated address provided by the USPS.

5. As November 26, 2024, 329,459 Short Form Notices were returned by the USPS as undeliverable as addressed, without a forwarding address. Kroll ran 326,659 undeliverable records through an advanced address search.² The advanced address search produced 254,598 updated addresses. Kroll has re-mailed Short Form Notices to the 254,598 updated addresses obtained from the advanced address search. Of the 254,598 re-mailed Short Form Notices, 4,628 have been returned as undeliverable a second time.

CLAIM ACTIVITY

6. The Claims Deadline was November 12, 2024. As of November 26, 2024, Kroll has received 515 Claim Forms through the mail and 23,974 Claim Forms filed electronically through the Settlement Website. Kroll is still in the process of reviewing and validating Claim Forms.

EXCLUSIONS AND OBJECTIONS

7. The Opt-Out and Objection Deadlines were November 12, 2024.

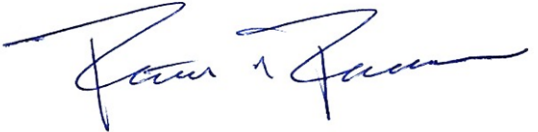
8. As of November 26, 2024, Kroll has received an additional twenty-three (23) Requests for Exclusion, for a total of thirty-six (36) Requests for Exclusion, and three (3) additional objections to the Settlement, for a total of five (5) objections. One objector, Mary Clarke, has also

² As directed by the Parties, the remaining 2,800 Short Form Notices were not remailed as they were received after the final advanced address search was executed.

1 submitted a claim. An updated list of the Requests for Exclusion received is attached hereto as
2 **Exhibit A**, and the five (5) objections are attached hereto as **Exhibits B through F**.

3 **CERTIFICATION**

4 I declare under penalty of perjury under the laws of the United States that the above is true
5 and correct to the best of my knowledge and that this declaration was executed on November 26,
6 2024, in Delaware, Ohio.

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PATRICK M. PASSARELLA

Exhibit A

Exclusion List

Count	Record Identification Number
1	83079CZ1KZ8PD
2	83079FZ9TXFHV
3	83079FBX032R4
4	83079H7CDGSZG
5	83079H542RSD4
6	83079D7Y6FZ71
7	83079CD0FNFKB
8	83079F85GWJYX
9	83079GH43K0TM
10	83079DNY2NCY7
11	83079FWKV3TG0
12	83079NK7QRY2J
13	83079FJ90D9RQ
14	83079H9DMVNT1
15	83079F165T17B
16	83079CDTVSXD7
17	83079GVW492RX
18	83079GXV0P40M
19	83079G99R8SHY
20	83079FSGTQ1N7
21	83079CYVV9RTV
22	83079CG33098D
23	83079HD9TFTYZ
24	83079GB23716P

Exhibit B

Dear Sir,

my name is Annai E

Macl Davis I am the
Guardian of Dominiquesia
Davis I will like to object
to the Settlement

Thank you

Annie Marie Davis

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Document 81

Filed 11/26/24

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17 SEP 2024 PM 3 L



RPM Date Incident Settlement
C/O Kroll Settlement Administration
P.O. Box 225391
New York, NY 10150-5391

10150-539191

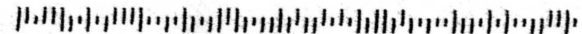


Exhibit C

OBJECT:-

Reason: Stay in the Settlement Class

EXPLAIN: I'm from the Old School paper there were Not Computer, We all brough those story's those Company Was selling about more Servicer reachout Kept up with the time,

So thing change. Then We got all things faster & better living master mind.

America Are the Only Natural Data get cyberattack they Data OR that Not Known why is that??

So I want the companies that let my Data get taken let them know your Servicer can or can't Keep my Data safe Leaves the bussiness move with the time important,

but until My Object
Settlement Class

Mary Clarke

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Filed 11/26/24

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RPM Data incident Settlement
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

1015035391 8090

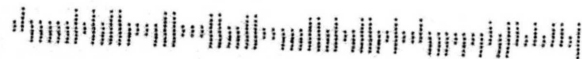


Exhibit D

Settlement Administrator

11-6-24

in Settlement in Hightower

et al. v. Receivables Performance

Management, LLC, Case NO. 2:22-cv-01683-RSM

Totally Object to the whole thing. Sorry barely writing to you. I've been a little busy. I'm going through stolen identity as well as Bankruptcy court allegedly. I also have appeals going on all at the same time. Benefits appeal. Extra jobs I've never worked for I've been at my same job for going on almost 2 yrs. Lived in ~~another~~ same state Texas I have so much paperwork on stolen identity. Recent transcripts from IRS. Having to wait for info on different companies. My mail is barely starting to find me again after two years. I'm not doing nothing on Online due to the fact that's how they were able to get in. So I'm writing to everyone sending stolen identity case. I have multiple credit reports. Bank statements. yes would love reimbursement for all the extra stuff I've been having to pay for that I had no control over. All my Credit Bureaus should be frozen for two years already. Also HHS Department has info with multiple accounts. extra jobs I never even applied to. I'm waiting on a appeal also. allegedly one of my Biological Fathers incarcerated and allegedly have a child support lawyer that was never hired. Wrote to her already Please update my info. Thank you if any questions don't hesitate to reach out.

Erica Ann Arevalo

Erica Arevalo
Birthday



FEDERAL TRADE COMMISSION

Identity Theft Report

FTC Report Number:

I am a victim of Identity theft. This is my official statement about the crime.

Contact Information

First Name:	Middle Name:	Last Name:
Erica	Ann	Arevalo
Address:	Phone:	Email:
[REDACTED]	[REDACTED]	[REDACTED]

Personal Statement

[REDACTED]

Accounts Affected by the Crime

Credit Card Opened by the Thief	
Company or Organization: [REDACTED]	
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

Landline Phone Account Opened by the Thief	
Company or Organization: [REDACTED]	
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

Fraudulent Checking or Savings Account	
Company or Organization: [REDACTED]	
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

Check Fraud	
Company or Organization: [REDACTED]	
Date that I discovered it:	Total fraudulent amount:
1/2020	\$ 0

Suspect Information

Contact Information	Address: [REDACTED] Email Address: [REDACTED]
Relationship	Other

Under penalty of perjury, I declare this information is true and correct to the best of my knowledge.

I understand that knowingly making any false statements to the government may violate federal, state, or local criminal statutes, and may result in a fine, imprisonment, or both.

Erica Ann Arevalo

7/15/2022

Erica Ann Arevalo

Date

Use this form to prove to businesses and credit bureaus that you have submitted an FTC Identity Theft Report to law enforcement. Some businesses might request that you also file a report with your local police.

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL

Retail



RDC 99

U.S. POSTAGE PAID
FCM LETTER

NOV 06, 2024

\$5.58

S2324K504088-22

RPM Data Incident Settlement
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

10150-5391



Exhibit E

RPM Data Incident Settlement
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150-5391

3:00
fail
je
CA
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ELECTRONIC SERVICE REQUESTED

RPM Data Incident Settlement

U.S. District Court for the WESTERN
DISTRICT OF WASHINGTON

Hightower, et al. v. Receivables Performance
Management, LLC, Case No. 2:22-cv-01683-RSM

**IF YOU WERE NOTIFIED BY RECEIVABLES
PERFORMANCE MANAGEMENT, LLC
REGARDING THE APRIL 2021 DATA INCIDENT,
YOU MAY BE ELIGIBLE FOR PAYMENT AND
CREDIT MONITORING SERVICES FROM A
CLASS ACTION SETTLEMENT.**

*Si desea recibir esta notificación en español,
llámenos o visite nuestra página web,*

www.RPMDataSettlement.com

UNIQUE CLAIMANT ID:

Postal Service: Please do not mark barcode

64105-P015-T1993-0905454*****AUTO**S-DIGIT 73034

Caleb Rowton



TO Settlement Administrator
RPM

TO ~~RPM~~ Data Incident Settlement

Regarding Hightower et al VS Receivable Performance
Management LLC Case No. 2:22-CV-01683-RSM

Claimant ID: [REDACTED]

- I wish to stay in the settlement but
I hereby object to the grossly low amount
of payment from the notice I attached
I have suffered hacking, ID theft
and much more. I will also write the judge
over this case reflecting my thoughts and the
prosecutor. I wish to stay in Settlement Class
but will aggressively pursue punitive damages
Best regards

Caleb Andrew Rowton
[REDACTED]

PM

Nov 12, 2024



RPM Data Incident Settlement
c/o Kroll Settlement Admin LLC
P/O Box 225391
New York, NY 10150-5391

10150-539191



Exhibit F



COR0000327

Nov. 11, 2024

My objection is in a disagreement with all parties of the settlement.

(only) [redacted]
[redacted]
[redacted]

H. Bulis Jones

BIRMINGHAM AL 350

18 NOV 2024 PM 5 L



RPM Data Incident Settlement
c/o Kroll Settlement Administration LLC
P.O. Box 225391
New York, NY 10150 5391

10150-539191

